

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HMD GLOBAL OY,

Movant,

v.

ACACIA RESEARCH CORPORATION,

Respondent.

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C.A. No. 2:21-mc-00002-JRG

JOINT MOTION TO EXTEND STAY OF ALL DEADLINES

In the underlying case related to this miscellaneous matter, *Cellular Communications Equipment LLC v. HMD Global Oy*, Case No. 2:20-CV-78-JRG (E.D. Texas), Movant HMD Global Oy (“HMD Global”) and the Plaintiff in the underlying matter, Cellular Communications Equipment LLC (“CCE”) have jointly filed a motion to extend the stay of all deadlines in order to facilitate the terms of their Settlement and Patent License Agreement. Accordingly, the parties to this matter, HMD Global and Respondent, Acacia Research Corporation (“ARC”) (collectively, the “Parties”), respectfully submit this Joint Motion to Extend Stay of All Deadlines. The Parties would respectfully inform the Court as follows:

Based on the Joint Motion filed by HMD Global and CCE requesting an extension of the stay in the underlying case by fourteen (14) days, the Parties hereby request that the Court also extend the current stay in this miscellaneous matter for an additional fourteen (14) days. A proposed order is submitted herewith.

Dated: March 17, 2021

Respectfully submitted,

<p><u>/s/ Jeffrey R. Bragalone</u> Jeffrey R. Bragalone (lead attorney) Texas Bar No. 02855775</p> <p>BRAGALONE OLEJKO SAAD PC 2200 Ross Avenue Suite 4500W Dallas, TX 75201 Tel: (214) 785-6670 Fax: (214) 785-6680 jbragalone@bosfirm.com</p> <p>ATTORNEYS FOR RESPONDENT ACACIA RESEARCH CORPORATION</p>	<p><u>/s/ Deron R. Dacus</u> Deron R. Dacus State Bar No. 00790553 The Dacus Firm, P.C. 821 ESE Loop 323, Suite 430 Tyler, TX 75701 +1 (903) 705-1117 +1 (903) 581-2543 facsimile ddacus@dacusfirm.com</p> <p>Matthew S. Warren (California Bar No. 230565) Jen Kash (California Bar No. 203679) Erika Warren (California Bar No. 295570) Warren Lex LLP 2261 Market Street, No. 606 San Francisco, California 94114 +1 (415) 895-2940 +1 (415) 895-2964 facsimile 20-78@cases.warrenlex.com</p> <p>ATTORNEYS FOR MOVANT HMD GLOBAL OY</p>
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CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(h), (i), I certify that counsel for CCE conferred with counsel for HMD Global on March 17, 2021 via email exchanges and, as reflected in the body of the Motion, the Parties agree to the form and substance of the Motion, the Motion is unopposed, and the parties jointly submit it to the Court.

/s/ Jeffrey R. Bragalone
Jeffrey R. Bragalone

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on March 17, 2021.

/s/ Jeffrey R. Bragalone
Jeffrey R. Bragalone